
From: Roger Bernstein <rbernstein@rjblaw.com>
Sent: Tuesday, August 30, 2022 1:02 PM
To: Williams, William A.; Allen, Angela M.
Cc: James P. Chou
Subject: Javeri bank statements; second stipulation
Attachments: Chase ...7198 and 3783 (same statement) January and February 2020 (accn't closing).pdf; Chase CC Anya ... 2331.pdf; Javeri Bank Statement Production Progress Report as of August 29, 2022.xlsx

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Bill and Angela,

In general, the bank accounts follow a sequence because almost every bank required Ami to close her accounts. When she had to open a new account the new bank eventually required closing it as well. The accounts were initially with HSBC; you already have these statements. In 2018 those balances were transferred to Finemark, a Florida bank that used remote banking via banking app. The Finemark accounts were open for less than a year and the ordered statements have not yet been provided. Subsequent accounts were at Chase, closed in 2020, at Santander Bank only between 2018 and 2019, and at Citibank. The accounts at Wells Fargo remain open and in use and you have only some of the statements.

More details are on your excel spreadsheet/chart, which I have re-arranged in approximately the sequence of the accounts and updated and attached in the form of a progress report. I have tried to identify the account closing dates and related withdrawals on this chart; there are gaps that still have to be filled in.

I have not had the Citibank statements ordered since Citibank has notified Ami that you have obtained those by subpoena. If you believe that Citibank's production has not been complete, let me know what statements need to be ordered from them. As to the Chase accounts that you have identified, the bank has provided statements for the accounts ending 7198, 3738 and 2331. Please provide me with the full account numbers for accounts ending 5052, 7938, 8956, 7016, 8846 and 7096 and I will have those ordered, unless you have obtained them by subpoena already. You requested the January 2020 statements for accounts ending in 7198 and 3738; those accounts ended in February 2020 and the statement and other detail are attached. As to the Wells Fargo statements that you have identified, I will also have these ordered.

I don't see how full production of the bank statements can take place by August 31st as currently recited in the second stipulation. I suggest substituting a requirement to make diligent inquiries of all banks for statement production.

We have a conference call with our clients scheduled for tomorrow afternoon concerning the last draft of the second stipulation and expect to be able to call you about tomorrow or Thursday.

Regards - Roger

Roger J. Bernstein, Attorney at Law
551 Fifth Avenue, 12th Floor
New York, NY 10176
Tel: (212) 748-4800 (o); (917) 566-5246 (m)

rbernstein@rjblaw.com

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